

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Beckham Jewelry, LLC, Debtor**

**Case No. 25-01234-JAW  
CHAPTER 11**

**NOTICE OF OBJECTION TO CLAIM**

**You are hereby notified** that an objection to your claim has been filed in the above-referenced bankruptcy case. Your claim may be reduced, modified, or eliminated. If you do not want the Court to eliminate or change your claim, a written response to the attached objection to claim must be filed with:

Clerk, U.S Bankruptcy Court  
Southern District of Mississippi  
Danny L. Miller  
P.O. Box 2448  
Jackson, MS 39225-2448

and a copy must be served on the undersigned Debtor's attorney and the case trustee on or before thirty (30) days from the date of this notice. In the event a written response is filed, the court will notify you of the date, time, and place of the hearing thereon.

This date, July 29, 2025.

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469)  
Jennifer A Curry Calvillo (MSBN 104367)  
The Rollins Law Firm  
P.O. Box 13767  
Jackson, MS 39236  
601.500.5333  
trollins@therollinsfirm.com

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Beckham Jewelry, LLC, Debtor**

**Case No. 25-01234-JAW  
CHAPTER 11**

**OBJECTON TO PROOF OF CLAIM # 8 AS FILED BY  
KAPTIVUS SERVICING INC**

COMES NOW Debtor, by and through counsel, and files this Objection to Proof of Claim # 8 as filed by Kaptivus Servicing Inc. on or about July 23, 2025 in the amount of \$46,957.90, which include \$8,731.25 in attorneys' fees.

The Debtor objects to the inclusion of these attorneys' fees on the grounds that they are not adequately documented, are unreasonable under 11 U.S.C. 506(b), and fail to meet the standards established by applicable Fifth Circuit precedent.

Under 11 U.S.C. 506(b), a creditor may recover reasonable fees, costs, and charges provided for under the agreement or applicable state law. However, the creditor must substantiate such fees with sufficient documentation and the fees must be reasonable.

In *In re Prevo*, 394 B.R. 847 (Bankr. S.D. Tex. 2008), the court held that when a creditor fails to provide supporting documentation for its fees and costs, those fees are deemed unreasonable and unrecoverable. Here, the Creditor has not provided any invoices, time records, or other evidence to substantiate the \$8,731.25 in attorneys' fees included in its proof of claim.

Even if the attorneys' fees are contractually authorized, they must still be reasonable under 11 U.S.C. 506(b).

The Supreme Court in *Travelers Cas. & Sur. Co. of Am. v. PG&E*, 549 U.S. 443, 127 S. Ct. 1199 (2007) emphasized that claims for attorneys' fees must be enforceable under state law and reasonable. The Creditor has not demonstrated that the fees are reasonable or necessary to protect its interests in this case.

The burden of proof lies with the Creditor to establish the reasonableness of the attorneys' fees.

The Creditor's failure to provide detailed documentation or justification for the attorneys' fees renders them unreasonable and unrecoverable under applicable law.

The Debtor respectfully requests that the court disallows the \$8,731.25 in attorneys' fees included in the Creditor's proof of claim or Alternatively, require the Creditor to provide detailed documentation and justification for the attorneys' fees; and Grant such other and further relief as the Court deems just and proper.

This date, July 29, 2025

Respectfully submitted,

By: /s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr.  
Attorney for Debtor

Of Counsel:  
Thomas C. Rollins, Jr. (MSBN 103469)  
Jennifer A Curry Calvillo (MSBN 104367)  
The Rollins Law Firm  
P.O. Box 13767  
Jackson, MS 39236  
601.500.5333  
trollins@therollinsfirm.com

**CERTIFICATE OF SERVICE**

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Notice of Objection and Objection were forwarded on July 29, 2025 to:

By first class mail, postage pre-paid:

Kapitus Servicing Inc.  
120 West 45<sup>th</sup> Street, 4<sup>th</sup> Floor  
New York, NY 10036

Kapitus  
2500 Wilson Blvd, Ste 350  
Arlington, VA 22201

By Electronic CM/ECF Notice:

Chapter 13 Case Trustee

U.S. Trustee

/s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr.

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

Beckham Jewelry, LLC

CASE NO: 25-01234

**DECLARATION OF MAILING  
CERTIFICATE OF SERVICE**

Chapter: 11

On 7/29/2025, I did cause a copy of the following documents, described below,  
Notice and Objection to Proof of Claim

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 7/29/2025

/s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr.

The Rollins Law Firm  
702 West Pine St  
Hattiesburg, MS 39401  
601 500 5533  
trollins@therollinsfirm.com

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

Beckham Jewelry, LLC

CASE NO: 25-01234

**CERTIFICATE OF SERVICE  
DECLARATION OF MAILING**

Chapter: 11

On 7/29/2025, a copy of the following documents, described below,

Notice and Objection to Proof of Claim

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 7/29/2025



Miles Wood  
BK Attorney Services, LLC  
d/b/a certificateofservice.com, for  
Thomas C. Rollins, Jr.  
The Rollins Law Firm  
702 West Pine St  
Hattiesburg, MS 39401

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

FIRST CLASS

KAPITUS SERVICING INC.  
120 WEST 45TH STREET, 4TH FLOOR  
NEW YORK NY 10036

FIRST CLASS

KAPITUS  
2500 WILSON BLVD, STE 350  
ARLINGTON VA 22201